

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Docket No.: 07 CV 5777 (DLC)

VERDELLE WATSON,

Plaintiff,

-against-

THE LONG ISLAND RAIL ROAD COMPANY,

Defendant.

***PROPOSED QUESTIONS  
TO BE ASKED OF  
POTENTIAL JURORS***

- X
1. Do any of you know the plaintiff, Verdelle Watson?
  2. Do any of you know any attorneys from the firm of Sable & Gold and/or their representative, trial attorneys for the plaintiff?
  3. Do any of you know Christopher P. Yodice, trial attorney for the defendant, LIRR?
  4. Are any of you or members of your family associated with any union or unions?
  5. Are any of you or members of your family affiliated with any transportation union?
  6. Do any of you know any of the officials in these unions?
  7. Do any of you have any friends or relatives working on the Long Island Rail Road?
  8. Have any of you served on any previous juries? If so, in what capacity? Was it a civil or criminal case?
  9. Do any of you know any of the following people who may or may not be called as witnesses? (The Court can name the witnesses.)
  10. Have any of you ever sued or been sued and did it leave any particular feelings with you towards plaintiffs, defendants, lawyers or Judges? (Ask for details of said lawsuits.)

11. Do any of you know either personally, socially or in a medical capacity the following doctors? (The Court can name the doctors.)
12. Is any member of your immediate family a lawyer or a doctor?
13. Do you have any close friends who are lawyers or doctors?
14. What type of practice does the lawyer have? What type of practice does the doctor have?
15. Do you feel that everyone who brings a lawsuit is entitled to recover regardless of whether or not they make out a case under the law as given to you by the Court?
16. Have you ever sued anyone or have you ever been sued?
17. Do you have any personal feelings one way or the other against the defendant?
18. Do you believe that a corporation has the same rights in a lawsuit as an individual?
19. Do you have anything against The Long Island Rail Road Company or any of its employees?
20. Have you ever had any experience(s) with The Long Island Rail Road Company, either favorable or unfavorable?
21. Do you know anyone who was ever injured or hurt on the Long Island Rail Road, particularly a close friend or relative?
22. Do you realize this is a lawsuit and you are to judge all parties equally and without prejudice or sympathy?
23. If you find that the plaintiff was injured or had a certain injury, would you give him money solely because of his injury, regardless of whether the Railroad was at fault?
24. If you found that the Railroad did not cause plaintiff's injury, would you be willing, despite your natural sympathies for an individual, to return a verdict in favor of the defendant, LIRR?

Dated: Jamaica, New York  
July 3, 2008

Respectfully Submitted,

**J. DENNIS McGRATH, ESQ.**  
Attorney for Defendant

By:   
**CHRISTOPHER P. YODICE (CPY-9723)**

Law Department - 1143  
Jamaica Station  
Jamaica, New York 11435  
(718) 558-8235  
(File No.: JN-6355 / L06/000798)

TO: **FREDRIC M. GOLD, ESQ.**  
**SABLE & GOLD**  
Attorneys for Plaintiff  
450 Seventh Avenue  
New York, New York 10123  
(212) 244-2740